

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10-27-15

KAZLOW & KAZLOW
ATTORNEYS AT LAW

NEW YORK OFFICE
237 W. 35th Street, 14th Floor
New York, NY 10001
Phone: (212) 947-2900
Toll Free: (800) 772-9870
Fax: (212) 563-0629

www.kazlowandkazlow.com

VERMONT OFFICE
32 Main Street
Montpelier, VT 05602
Phone: (802) 479-8990
Toll Free: (800) 772-9870
Fax: (802) 223-4689

Gene R. Kazlow, Esq.
Stuart L. Sanders, Esq.
Ingrid Golemi, Esq.

MEMO ENDORSED

October 26, 2015

Alan Rome, Esq.**

**Also admitted in
Massachusetts

VIA FAX (212) 805-7949 and E-FILING

Hon. P. Kevin Castel
United States District Court Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 12C
New York, NY 10007-1312

Re: Navana Logistics Limited v. TW Logistics, LLC, et al.
Case No. 15 CV 856 (PKC)

Dear Judge Castel:

As indicated in the letter that was jointly sent to you by Gene R. Kazlow, Esq., of my firm, and Jeffrey A. Maidenbaum, Esq., of Maidenbaum & Associates, PLLC, our firms represent the factories whose shipments are at issue in the above-captioned action. According to the briefing schedule proposed in that letter, the factories have until this Thursday, October 29, 2015, in which to file a motion to intervene in the action. I am writing to request that the deadline for filing the motion be extended by two weeks to November 13, 2015.

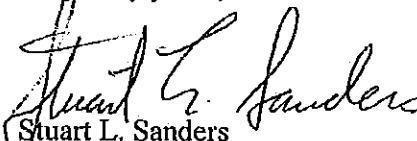
The reason for this request is that although we believe that the factories, being the real parties in interest in this matter, can easily satisfy the requirements for either intervention as of right or permissive intervention under Fed. R. Civ. P. Rule 24(a)(2) and (b)(1)(B), the attorneys for the factories need the additional time to complete our investigation of the underlying facts, so that the pleading required by Fed. R. Civ. P. Rule 24(c) can be prepared in a manner in keeping with our responsibilities under Fed. Rule Civ. P. Rule 11(b). The additional time is needed because there are approximately thirty shipments by seven different factories at issue in this case, with many related documents to be examined and facts to be determined. In addition, the attorneys for the factories are mindful of, and need more time to review, the arguments raised by the TW Logistics defendants and Israel Discount Bank, in their respective motions to dismiss the action, that they have no liability with respect to the shipments in question.

*Revised
schedule
approved.
SO ORDERED
10-27-15*

Hon. P. Kevin Castel
October 26, 2015
Page 2

It is therefore requested that the briefing schedule be revised as follows: November 13, 2015, for the factories to file their motion; December 4, 2015 for the current parties to respond; and December 11, 2015 for the factories to reply.

Very truly yours,


Stuart L. Sanders

cc: Jeffrey A. Maidenbaum, Esq. (via e-mail)
Rick Aaron Steinberg, Esq. (via e-mail)
Laurie Sayevich Horz, Esq. (via e-mail)
David Hamilton, Esq. (via e-mail)
Leonard L. Flesig, Esq. (via e-mail)
Stuart Martin Steinberg, Esq., (via e-mail)